

# GERAGOS & GERAGOS

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AKA ICE CUBE, AND JEFF KWATINETZ

## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

BIG3 LLC, a limited liability company;  
O'Shea Jackson a/k/a Ice Cube, an  
individual; and Jeff Kwatinetz, an  
individual;

Plaintiffs

vs.

Ahmed Al-Rumaihi, an individual; Faisal  
Al-Hamadi, an individual; Ayman Sabi, an  
individual; Sheikh Abdullah bin Mohammed  
bin Sau Al Thani, an individual and as CEO  
of Qatar Investment Authority; DOES 1-100

Defendants.

Case No. 2:18-cv-03466-DMG-SK

Assigned for all purposes to  
Hon. Dolly M. Gee

### **DECLARATION OF BEN MEISELAS IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY**

1 I BEN MEISELAS DECLARE,

2 1. I am an attorney of record for Plaintiffs and I am licensed to practice law  
3 before this Court and this State. If called as a witness I could and would testify to the  
4 following.

5 2. After exchanging written correspondence the week prior, on Wednesday, May  
6 2, 2018, I completed a Local Rule 7-3 Conference with Brian Hershman, attorney for  
7 Defendants Ahmed Al-Rumaihi, Ayman Sabi, and Faisal Al-Hamadi. The meet and confer  
8 was to discuss (1) Plaintiffs' anticipated Motion for Limited Jurisdictional Discovery, and  
9 (2) Defendants' anticipated Motion to Strike.

10 3. I informed Mr. Hershman that the jurisdictional motion and issues surrounding  
11 Plaintiffs' contention that Defendants improperly removed this action must be addressed first  
12 before the Motion to Strike is heard. Obviously, if this Court does not have jurisdiction in  
13 this case, it cannot entertain the Motion to Strike.

14 4. In order to resolve our view that Mr. Al-Rumaihi is now a permanent resident  
15 and domiciled in Los Angeles, California, since purchasing and/or leasing homes in Los  
16 Angeles, California in November and December 2017, I requested that Mr. Hershman  
17 informally exchange and provide limited documents and information, subject to lawful and  
18 agreed upon redactions. Mr. Hershman rejected this request and stated "go file the motion."  
19 Mr. Hershman filed a Motion to Strike on Friday, May 4, 2018 prior to giving Plaintiffs an  
20 opportunity to file their motion for jurisdictional discovery as I discussed during the meet  
21 and confer. Defendants' scheduled the motion to provide only 5 days for Plaintiffs to  
22 respond to the Motion to Strike.

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5. Attached hereto as Exhibit “A” is a true and correct copy of the limited jurisdictional discovery Plaintiffs requested, and are requesting, only as to Defendant Al-Rumaihi in this action. Plaintiffs do not seek any additional jurisdictional discovery.

# EXHIBIT "A"

## PLAINTIFFS' LIMITED JURISDICTIONAL DISCOVERY

### REQUEST FOR PRODUCTION OF DOCUMENTS:

*TO DEFENDANT AHMED AL-RUMAIHI, PLEASE PRODUCE THE FOLLOWING DOCUMENTS:*

1. A copy of the B-1 Visa alleged in your declaration filed in connection with the removal, and all extensions of time for the B1 Visa filed by you.
2. A copy of the lease and/or purchase agreements for the home in (1) Venice, California and (2) Beverly Hills, California.
3. A copy of the lease agreement for the Bentley SUV kept in Los Angeles, that you are driven in.
4. A copy of any loan agreements with any Los Angeles bank, bankers, and lenders for \$5 million or more.

### INTERROGATORIES:

*TO DEFENDANT AHMED AL-RUMAIHI, PLEASE ANSWER THE FOLLOWING INTERROGATORIES:*

1. List all dates you were a United States citizen.
2. List the dates when you renounced your United States Citizenship.
3. List the business activities of a commercial or professional nature in the United States under which you claim to hold a B1-Visa.
4. In the past three years, list the dates you have been in the United States without departure, and list the dates you have been in Qatar without departure.
5. List any and all immigration documents you hold, including but not limited diplomatic status.
6. List the date when you were last in Qatar.
7. List the date you are scheduled to return to Qatar.